

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(ROCK HILL DIVISION)

TIFFANY COLEMAN, KELI SWANN,
and HEATHER BROOKE,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

BRITAX CHILD SAFETY, INC.,

Defendant.

CASE NO.: 0:21-cv-00721-SAL

**NOTICE OF SETTLEMENT
AND JOINT MOTION TO STAY PROCEEDINGS**

Plaintiffs Heather Brooke, Tiffany Coleman, and Keli Swann and Defendant Britax Child Safety, Inc. hereby notify the Court that the parties have reached an agreement-in-principle to settle the litigated claims in this case on a class-wide basis, subject to Court approval.

The parties are presently drafting a Settlement Agreement and related documents. Plaintiffs' counsel anticipates filing the Settlement Agreement and related documents with the Court as part of a Motion for Preliminary Approval within the next 60 days. Accordingly, the parties jointly move for an order staying all proceedings in the case for 60 days. The parties further request the Court set a deadline of August 25, 2023 for Plaintiffs to file their Motion for Preliminary Approval.

Dated: June 21, 2023.

MILBERG COLEMAN BRYSON PHILLIPS
GROSSMAN, PLLC

By: /s/ Harper T. Segui

Harper T. Segui
Martha A. Geer*
900 W. Morgan Street
Raleigh, NC 27603
Phone: (919) 600-5000
Fax: (919) 600-5035
hsegui@milberg.com
mgeer@milberg.com

Jonathan B. Cohen*
800 S. Gay Street, Suite 1100
Knoxville, TN 37929
Phone: (865) 247-0080
Fax: (865) 522-0049
jcohen@milberg.com

**Admitted pro hac vice*

Attorneys for Plaintiffs

Respectfully submitted,

WOMBLE BOND DICKINSON (US), LLP

By: /s/ Kevin A. Hall

Kevin A. Hall (Federal Bar No. 5375)
kevin.hall@wbd-us.com
M. Todd Carroll (Federal Bar No. 9742)
todd.carroll@wbd-us.com
Bryant S. Caldwell (Federal Bar No. 13125)
bryant.caldwell@wbd-us.com
1221 Main Street, Suite 1600
Columbia, South Carolina 29201
Tel: (803) 454-6504

Mark P. Henriques (NC Bar. No. 18701)
mark.henriques@wbd-us.com
3500 One Wells Fargo Center
301 South College Street
Charlotte, North Carolina 28202-6025
Tel: (704) 331-4912
Admitted pro hac vice

MORRISON & FOERSTER LLP

Purvi G. Patel (CA Bar No. 270702)
PPatel@mofo.com
707 Wilshire Boulevard, Suite 6000
Los Angeles, California 90017-3543
Tel: (213) 892-5200
Fax: (213) 892-5454
Admitted pro hac vice

Erin M. Bosman (CA Bar No. 204987)
EBosman@mofo.com
12531 High Bluff Drive, Suite 100
San Diego, California 92130
Tel: (858) 720-5100
Fax: (858) 720-5125
Admitted pro hac vice

Zachary S. Newman (NY Bar No. 5651518)
ZNewman@mofo.com
250 West 55th Street
New York, New York 10019
Tel: (212) 468-8000
Fax: (212) 468-7900
Admitted pro hac vice

Attorneys for Defendant Britax Child Safety, Inc.